

Morgan Matroc, Inc.

▲ Electro Ceramics Division

232 Forbes Road
Bedford Ohio 44146 USA
Telephone (216) 232 8600
FAX (216) 232 8731



February 6, 1998

Mr. Ed Fasko
Chief Air Quality Engineer
Cleveland Air Pollution Control
1925 St. Clair Avenue
Cleveland, OH 44114

SUBJECT: Request for withdrawal of electronically submitted Title V Permit Application (Control No. 000003531) and designation of facility to non-Title V status for the Morgan Matroc, Inc., Bedford, Ohio facility

Dear Mr. Fasko:

On Friday, September 27, 1996, Morgan Matroc, Inc. electronically submitted a Title V Application (Control No. 000003531) for their Bedford, Ohio facility (Facility I.D. No. 13-18-03-1627). This submission was intended to serve as a complete facility Permit to Operate application requesting federally enforceable limitations on the facility's perchloroethylene usage. During the permit review process and subsequent requests for additional information from the state, Morgan Matroc, Inc. became aware of the fact that facility perchloroethylene usage had been reduced to the point that actual and potential emissions of perchloroethylene were below the applicable thresholds, therefore nullifying the requirement for a federally enforceable facility state operating permit.

Based on this information, Morgan Matroc, Inc. respectfully requests that this application submittal (Control No. 000003531) be removed from the STARShip database and all paperwork related to this application be returned to the following address:

Attn: William Hocevar
Morgan Matroc, Inc.
Electro Ceramics Division
232 Forbes Road
Bedford, Ohio 44146

The Title V Permit applicability statement for this facility was based on production during the 1995 calendar year. At this time, the recordkeeping and documentation of perchloroethylene usage was not sufficient to conduct a thorough materials balance. Available records indicated the facility had actual annual emissions of 9.42 tpy (based upon 5,880 operating hours) and a potential to emit of 14.03 tpy (based upon 8,760 operating hours) of an individual hazardous air pollutant (perchloroethylene). The facility potential to emit for Total HAPs was well below the 25 tpy threshold (17.81 tpy).

Based upon these results it was decided to submit a facility permit with federally enforceable limitations on perchloroethylene usage.

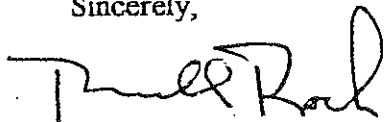
A revised permit to operate (PTO) was submitted to Cleveland Air Pollution Control Agency in February 1996 for Ohio EPA Source P019. The existing vapor degreaser was equipped with a new: (1) freeboard chiller, (2) refrigeration system, and (3) automatic cover. Additionally, improved operating and work practice standards for the vapor degreaser using perchloroethylene were implemented.

The engineering and operational changes resulted in actual annual emissions of 4.6 tpy and a potential to emit of 6.80 tpy of perchloroethylene for 1996 and an actual annual emissions of 4.9 tpy and a potential to emit of 7.3 tpy of perchloroethylene for 1997 (based upon 5,880 actual operating hours for both calendar years). (Please see attached tables for a summary of the 1996 and 1997 total facility actual and potential emissions calculations).

Based upon the reduction in actual and potential perchloroethylene usage at the facility, Morgan Matroc, Inc. believes that they are not at this time subject to the requirements of the Title V permitting program. (Please see attached Title V Applicability Questionnaire). Please advise Mr. William Hocevar if any further level of documentation is required.

Please forward this document to the appropriate personnel at the state level for due attention. Thank you for your consideration in this matter. If you have any questions regarding this correspondence, please contact Mr. William Hocevar at (216) 232-8600.

Sincerely,



Ronald Roch
President
Morgan Matroc, Inc.

cc: W. Hocevar
D. Mehls

Attachments